

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

DR. AHMED GHANIM,

Plaintiff,

Case No. 24-13086

vs.

Hon. F. Kay Behm

~~WORLDWIDE ENTERTAINMENT~~
~~ROMT, LLC, d/b/a ROYAL OAK~~
~~MUSIC THEATER, AEG PRESENTS~~
MI, LLC, and BIDEN FOR PRESIDENT
CAMPAIGN COMMITTEE, INC.
d/b/a HARRIS FOR PRESIDENT

Defendants.

AKEEL & VALENTINE, PLC
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MOTION TO AMEND CASE CAPTION

NOW COMES Plaintiff, Dr. Ahmed Ghanim, by and through his attorneys
AKEEL & VALENTINE, PLC, and for his Motion to Amend Case Caption states
the following:

1. Plaintiff filed his First Amended Complaint on February 24, 2025 [ECF No. 5], naming Defendant Biden for President Campaign Committee, Inc. d/b/a Harris for President.
2. Plaintiff has since learned that Defendant, Biden for President Campaign Committee, Inc. also conducts business as BFPCC, Inc.
3. After completing service on Defendant at its registered agent, Legalinc, the summons and complaint were returned by the registered agent stating that they could not accept service for the name “Biden for President Campaign Committee, Inc.” as it did not precisely match the entity name recognized for service. (**Exhibit A** – Letter from Legalinc regarding unable to accept service). The registered agent however accepts service for BFPCC, Inc. (**Exhibit B** – LARA business entity search for BFPCC).
4. Plaintiff seeks to amend the case caption to reflect the additional d/b/a for Defendant, Biden for President Campaign Committee, Inc as BFPCC, Inc.
5. Plaintiff further requests that the Clerk be directed to issue an amended summons reflecting this updated d/b/a so that service may be properly completed.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

- a. Amend the case caption to reflect Defendant as Biden for President Campaign Committee, Inc., d/b/a Harris for President and BFPCC, Inc.; and,
- b. Issue an amended summons reflecting the updated Defendant as Biden for President Campaign Committee, Inc., d/b/a Harris for President and BFPCC, Inc.

Respectfully submitted,

AKEEL & VALENTINE, PLC

SHEREEF H. AKEEL

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